

EXHIBIT C

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DECLARATION OF DR. R. BRUCE BANNISTER

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2 1. I Robert Bruce Bannister, being first duly sworn, under penalty of perjury under
3 the laws of the State of Nevada depose and says: am over the age of 18 and am otherwise
4 fully competent to testify to the facts contained in this declaration.

5 2. I have personal knowledge of the matters asserted herein and am competent to
6 testify thereto, save for those matters asserted on information and belief, and for those
7 matters, I am informed and believe them to be true.

8 2. I was the Medical Director for the Nevada Department of Corrections ("NDOC")
9 until my retirement in May 2013.

10 3. I am a medical doctor and have been licensed to practice medicine in the State
11 of Nevada since 1985.

12 4. In connection with case *Tingley v. Nevada Department of Corrections, et al* case
13 number 3:14-cv-00358-MMD-VPC, currently pending in the United States District Court,
14 District of Nevada, the Nevada Office of the Attorney General, requested that I provide truthful
15 and accurate information relevant to legal briefs that the Defendants intend to file with the
16 Court in the Tingley Litigation and for other proper purposes.

17 5. As the NDOC Medical Director I was responsible for the formulation of health
18 policy regarding the health care delivery system, including developing and monitoring
19 standards and procedures for health care services for all inmates confined within the facilities
20 and the clinical operation of the Medical Division;

21 6. I have not personally met with Plaintiff or provided him medical care or a
22 consultation. During his time in prison his medical care has been provided by practitioners
23 within the institutions.

24 7. I retired from the position of Medical Director for the Nevada Department of
25 Corrections on June 10, 2013.

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1 Pursuant to 28 U.S.C. § 1746, Declarant herein certifies, under penalty of perjury
2 under the laws of the United States, that the foregoing is true and correct.

3 Dated: 28th day of January, 2016.

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DR. R. BRUCE BANNISTER